

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Saadya Mastafa and Kafia Ismail)	Case No.: 07 CIV 7955
)	
Plaintiffs,)	
)	Judge: Honorable Gerard E. Lynch
v.)	
)	
Australian Wheat Board Limited aka AWB)	
Limited and AWB (U.S.A.) Limited and)	
BNP Paribas,)	
Defendants.)	

DECLARATION OF JOHN T. MURRAY IN SUPPORT OF PLAINTIFFS
OPPOSITION TO DEFENDANTS AWB LIMITED, AWB (U.S.A.) LIMITED, AND
BNP PARIBAS MOTIONS TO DISMISS

John T. Murray hereby declares as follows:

1. I am a member of the Bar of this Court and a Partner of the firm Murray & Murray Co., L.P.A., counsel for Saadya Mastafa and Kafia Ismail, on behalf of themselves and all others similarly situated in this Action.
2. Attached hereto as Exhibit 1 is a true and correct copy of Security Council Resolution 986, U.N. Doc. S/RES/986, dated April 14, 1995 ("Resolution 986").
3. Attached hereto as Exhibit 2 is a true and correct copy of Security Council Resolution 661, U.N. Doc. S/RES/0661, dated August 6, 1990 ("Resolution 661").
4. Attached hereto as Exhibit 3 is a true and correct copy of the Memorandum of Understanding Between the Secretariat of the United Nations and the Government of Iraq on Implementation of Security Council Resolution 986, U.N. Doc. S/1996/356, dated May 20, 1996.

5. Attached hereto as Exhibit 4 is a true and correct copy of the relevant pages of *Prosecutor v. Tadic* (Case No. IT-94-1-T), Opinion and judgment, May 7, 1997. A full copy can be found at <http://www.un.org/icty/cases-e/index-e.htm>.

6. Attached hereto as Exhibit 5 is a true and correct copy of the relevant pages of *Prosecutor v. Furundzija* (Case No. IT-95-17/1-T), Judgment, Dec. 10, 1998. A full copy can be found at <http://www.un.org/icty/cases-e/index-e.htm>.

7. Attached hereto as Exhibit 6 is a true and correct copy of the *Bowoto v. Chevron Corp.* 2007 WL 2349341(N.D. Cal. August 14, 2007).

8. Attached hereto as Exhibit 7 is a true and correct copy of the “Statement attributable to the Spokesman for the Secretary-General on the Final Report of the Independent Inquiry on oil for food”, New York, 27 October 2005. www.un.org/apps/sg/sgstats.asp.

9. Attached hereto as Exhibit 8 is a true and correct copy of the New York Times Article: “Two Members of Hussein Tribunal Are Assassinated in Baghdad,” March 2, 2005, by Robert F.Worth and The Independent’s Article: “Murder of Iraqi judge sends out warning over Saddam trial,” March 3, 2005, by David Enders.

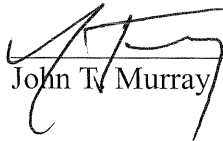
10. Attached hereto as Exhibit 9 is a true and correct copy of the *Pinochet Case*: Spain-Chile: Writ of the Instructing Court accepting the Jurisdiction in the Pinochet case, Summary Proceeding 1/98-J, AUDIENCIA NACIONAL, CENTRAL INVESTIGATORY COURT, NUMBER SIX, MADRID, September 20, 1998.

11. A true and correct copy of the report of the Independent Inquiry Committee into the United Nations Oil-For-Food-Programme (“IIC”), by Paul A. Volker, Chair, entitled *Manipulation of the Oil-For-Food-Programme By the Iraqi Regime* (Oct. 27, 2005) (the “Volker Report” or “IIC Report”) can be found at www.iic0offp.org.

12. A true and correct copy of the report of the Royal Commission led by Honourable Terence Cole AO RFD QC ("Cole Commission"), entitled *Report Of The Inquiry Into Certain Australian Companies In Relation To The UN Oil-For-Food-Programme* (Nov. 24, 2006) (the "Cole Inquiry") can be found at www.offi.gov.au.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on February 22, 2008


John T. Murray